



"I will stand for my client's rights.
I am a trial lawyer."
—Ron Motley (1944–2013)

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VIA CM/ECF

July 28, 2022

The Honorable George B. Daniels
U.S. District Judge
United States District Court
Southern District of New York
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *In re Terrorist Attacks on September 11, 2001*, No. 03 MDL 1570 (GBD)(SN)
This filing relates to:
Burnett, et al. v. Islamic Rep. of Iran, et al., No. 15 CV 9903 (GBD)(SN)
Arias, et al. v. Islamic Rep. of Iran, No. 19 CV 41 (GBD)(SN)

Dear Judge Daniels and Magistrate Judge Netburn:

I write today on behalf of Plaintiffs in the above-captioned case. Pursuant to 28 U.S.C. § 636(b)(1) and Rule 72(b) of the Federal Rules of Civil Procedure, Plaintiffs hereby notify the Court that Plaintiffs waive any objections to Judge Netburn's Report and Recommendation issued on July 26, 2022 (ECF No. 8268) recommending that the Court grant in part Plaintiffs' Notice of Motion for Entry of Partial Final Default Judgments on Behalf of Burnett/Iran and Arias Plaintiffs Identified at Exhibits A-1 and A-2 Who Were Not Immediate Family Members of a 9/11 Decedent ("Burnett/Iran XXV")(ECF No. 8010). In anticipation of the August 1, 2022, deadline to file an application for new claimants with the United States Victims of State Sponsored Terrorism Fund ("USVSST Fund"), Plaintiffs respectfully request that the Court enter final judgments consistent with Judge Netburn's Report and Recommendation.

Respectfully submitted,

John M. Eubanks

cc: All counsel of record (via CM/ECF)